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STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

**By ECF and by Fax**

Honorable Nelson Stephen Román  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: *Doherty v. Bice, et al.*, 18-cv-10898 (NSR)

Dear Judge Román:

This Office represents defendants Patricia Bice, Qui Qui Balascio, and Jared Stammer in their individual and official capacities ("Defendants") in the above-referenced action filed by plaintiff Jason Doherty ("Plaintiff"). On August 16, 2019, Your Honor ordered that a pre-motion conference was not necessary in this case, and set the following briefing schedule: "Defendants' Motion to Dismiss is due on September 20, 2019; Plaintiff's Opposition is due on October 21, 2019, and Defendants' Reply Memorandum is due on November 5, 2019." (Docket No. 22).

Defendants respectfully request a two-week extension for filing their motion to dismiss, and to propose the following schedule: Defendants' Motion to Dismiss is due on October 4, 2019; Plaintiff's Opposition is due on November 4, 2019, and Defendants' Reply Memorandum is due on November 19, 2019. Defendants make this request in light of significant litigation deadlines in other matters. Plaintiff has consented to this request.

Additionally, in light of the anticipated motion to dismiss, a stay of discovery is appropriate. On August 27, 2019, Defendants filed a letter motion with the Court, requesting a conference in anticipation of their proposed motion to stay discovery until a decision has been made on Defendants' motion to dismiss. (Docket No. 23). That application is *sub judice*.

Thank you for your attention to this matter.

Respectfully submitted,

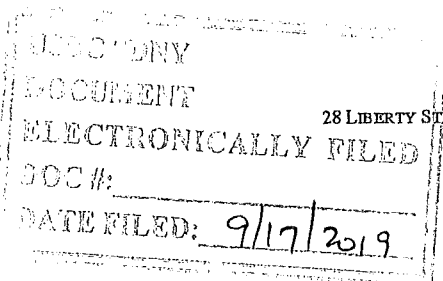
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Dfts' request to extend the briefing schedule as outlined below is granted on consent. Discovery is stayed pending the Court's resolution of Dfts' motion to dismiss. Clerk of the Court requested to terminate the motions (docs. # 23 and #25). All motion documents shall be filed on the reply date - Nov. 19, 2019.

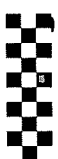
SO ORDERED:

HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

Dated: Sept. 17, 2019



/s/ Alyssa Anzalone-Newman  
Alyssa Anzalone-Newman  
Assistant Attorney General  
Attorney for Defendants  
(212) 416-8874



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Date: September 16, 2019

Subject: Doherty v. Bice, et al., 18-CV-10898

Total Pages: 4

Memo:

Dear Judge Román,

Attached please find a letter from Assistant Attorney General, Alyssa Anzalone-Newman, pertaining to Defendants' request for a two-week extension to file their motion to dismiss.

Any questions and/or comments regarding this matter should be directed to Ms. Anzalone-Newman at 212-416-8874.

Thank You

Regards,

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